

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

APPLICATION OF YULIA GURYEVA-  
MOTLOKHOV FOR AN ORDER SEEKING  
DISCOVERY PURSUANT TO 28 U.S.C. §  
1782

Case No. 25-MC-98 (JMF)

**NOTICE OF UNOPPOSED MOTION TO INTERVENE AND OPPOSED MOTION TO  
VACATE THE COURT’S MARCH 17, 2025 ORDER AND TO QUASH THE  
SUBPOENAS ISSUED PURSUANT THERETO**

**PLEASE TAKE NOTICE** that, upon the annexed Declaration of Nicholas M. Renzler dated April 11, 2025 (and accompanying exhibits), and the accompanying Memorandum of Law, Proposed Intervenors Gaston Alphonso Browne (a/k/a Gastone Browne), Maria Bird-Browne, Gaston Andron Browne III, Hyacinth Harris, Darwin Telemaque, and Accountant General – Antigua (Ickford Roberts); IF Antigua Inc., Farmer DG Browne Co. Limited, Cove Head Development Limited, and Cove Head Communications Limited (the “Antiguan Movants”), hereby respectfully move this Court, before the Honorable Jesse M. Furman, United States District Judge for the Southern District of New York, for an order, pursuant to 28 U.S.C. § 1782, Rules 24, 45, and 60 of the Federal Rules of Civil Procedure, and the Court’s inherent discretion and authority:

- 1) permitting the Antiguan Movants to intervene in the above-captioned proceedings;
- 2) vacating the Court’s Order dated March 17, 2025 and quashing the subpoenas issued pursuant thereto; and
- 3) granting such further relief as the Court deems proper and just.

Dated: April 11, 2025

Respectfully submitted,

/s/ Nicholas M. Renzler  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system, will be sent electronically to counsel for Applicant as identified on the Notice of Electronic Filing on April 11, 2025.

Additionally, in accordance with Rule 5(b)(2)(C) of the Federal Rules of Civil Procedure, service will be made on Respondents on April 11, 2025 by mail to:

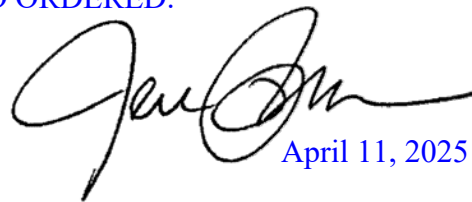
Federal Reserve Bank of New York  
33 Liberty St  
New York, NY 10045

The Clearing House Payments Company L.L.C  
115 Business Park Drive  
Winston-Salem, NC 27107

/s/ Nicholas M. Renzler  
Nicholas M. Renzler

The motion to intervene is GRANTED as unopposed. Any opposition to the motion to quash shall be filed by **April 25, 2025**, and shall not exceed twenty-five pages. Any reply shall be filed by **May 2, 2025**, and shall not exceed ten pages. If the parties believe that the Court should hold a conference (or take any other steps other than setting this briefing schedule), they should confer and file an appropriate letter motion.

SO ORDERED.



April 11, 2025